

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Peter E Tavani

: NO. 21-11689-MDC

: CHAPTER 13

Response to Motion for Relief filed by Wilmington Savings Fund Society

Debtor, by and through her attorney, responds as follows:

1-6. Admitted.

7. Admitted in part and denied in part. It is admitted that the Schedules accurately reflected the numbers at the time of filing. However, as a result of the substantial increase in residential real estate values in Newtown, Pennsylvania the current market is value is estimated to be \$690,000.00 and may be as high as \$739,000.00.

8. Admitted in part and denied in part. Since filing debtor has received a mortgage modification.

9-11. Admitted.

12. Denied. Movant has miscalculated the amount due and is substantially current. Debtor's spouse recently changes jobs and there was an unexpected lapse in income. That has been resolved and debtor can be completely current by the end of April.

13. Denied. Debtor can become current in a relatively short period of time. Movant is adequately protected and the real estate is necessary for a successful reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly